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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the Matter of the Application of San Diego
Gas and Electric Company (U902G) and
Southern California Gas Company (U904G)
for a Certificate of Public Convenience and
Necessity for the Pipeline Safety and
Reliability Project.

Application 15-09-013
(Filed September 30, 2015)

**PROTECT OUR COMMUNITIES FOUNDATION MOTION
FOR PARTY STATUS**

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In the Matter of the Application of San Diego Gas and Electric Company (U902G) and Southern California Gas Company (U904G) for a Certificate of Public Convenience and Necessity for the Pipeline Safety and Reliability Project.

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**PROTECT OUR COMMUNITIES FOUNDATION MOTION
FOR PARTY STATUS**

In accordance with the provisions of Rule 1.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), The Protect Our Communities Foundation (“POC”) respectfully moves for party status in this proceeding, the Application of San Diego Gas and Electric Company and Southern California Gas Company (“Applicant”) for a Certificate of Public Convenience and Necessity for the Pipeline Safety and Reliability Project. .

I. DESCRIPTION OF PROTECT OUR COMMUNITIES FOUNDATION

POC is a San Diego County based 501(c)(3) nonprofit dedicated to protecting wild and rural communities and the people, plants, and animals that inhabit them from destructive, industrial energy infrastructure development. POC advocates on behalf of Southern California utility ratepayers against fossil fueled energy development and in support of transition to sustainable energy systems. POC and its board members, members, and supporters have advocated before the Commission for the past decade representing the unique perspective of small and medium-sized communities throughout Southern California.

II. INTEREST IN THIS PROCEEDING

POC has a direct interest in A. 15-19-013 as the proposed project will impact health and safety and increase utility rates in Southern California. In this proceeding, POC will advocate before the Commission on the issues of safety, need, cost, impact on ratepayers, damage to the environment, health risks, as well as other topics germane to a CPCN proceedings and the approval of a new gas pipeline.

POC is concerned that the project presents a present and ongoing threat to the health and safety of many Southern California communities. The Applicant has delayed testing of the Line 1600 natural gas pipeline and intends to keep Line 1600 in operation without testing it until such time it can construct the new pipeline proposed in this proceeding. This approach puts the communities POC represents at risk from a pipeline that the PUC has already ordered to be tested.

POC is concerned that rates will be increased for an unneeded project that will put wildlife and its habitat at risk and be harmful to human and environmental health. The construction of a new pipeline will increase greenhouse gas emission both directly in the construction and operation of the pipeline and indirectly by enabling the growth of the fossil fuel trade in California by increasing the capacity of natural gas flow from Southern California to liquid-natural gas production facilities in Mexico.

POC intends to prepare and submit testimony in this proceeding that responds to the above matters and others that develop in this proceeding.

III. POC ADVOCACY IN THIS PROCEEDING

In the instant proceeding, POC intends to raise and argue the following factual and legal contentions, among others yet to be determined.

1. There is no need for this project.
2. Approval of this project will have detrimental effects on ratepayers in San Diego County.

3. Approval of this project will have significant adverse effects on wildlife and wildlife habitat including, but not limited to, the following endangered species: Arroyo Toad (*Anaxyrus californicus*), Least Bell's vireo (*Vireo bellii pusillus*), Southwestern Willow Flycatcher (*Empidonax traillii extimus*), Riverside Fairy Shrimp (*Streptocephalus wootoni*), San Diego Fairy Shrimp (*Branchinecta sandiegonensis*), California Orcutt Grass (*Orcuttia californica*), Del Mar Manzanita, San Diego Ambrosia (*Ambrosia pumila*), Stephens' Kangaroo Rat (*Dipodomys stephensi*) and the Quino Checkerspot Butterfly (*Euphydryas editha quino*).
4. The proposed location of the pipeline will impact cross freshwater emergent wetlands, riverine wetlands and freshwater forested/shrub wetlands.
5. This project will impact climate change by causing the direct and indirect emissions of greenhouse gases.
6. The current safety of SDG&E's pipelines has not been determined and SDG&E must assess its current lines before proposing a new replacement project based on safety and reliability concerns.

IV. TIMING

POC intends to fully participate in this proceedings by taking part in all hearings, legal briefing, and commenting in the CEQA process. A prehearing conference has not yet been held and a Draft Environmental Impact Statement has not been published. Neither the Applicant nor any parties in this proceeding would be prejudiced by POC becoming a party at this time because POC will be able to participate in all substantive aspects of this proceeding.

V. NOTICES

Service of notices, orders, and other communications and correspondence in this proceeding should be directed to April Rose Sommer, Executive Director and Lead Counsel for The Protect Our Communities Foundation at the address set forth below:

April Rose Sommer

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VI. CONCLUSION

The Protect Our Communities Foundation's participation in this proceeding will not prejudice the Applicant or any other party and will not delay the schedule or broaden the scope of the issues in the proceeding. To the extent possible, POC will coordinate with other parties who share POC's concerns. For the reasons stated above, POC respectfully moves for a ruling granting this motion for party status.

Respectfully submitted,

/s/ April Rose Sommer
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